IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
ORANGEBURG DIVISION

Sallie M. Zeigler, as Personal Representative of the Estate of Alton Ray Zeigler Plaintiff, vs. Eastman Chemical Company, Mundy Maintenance Service and Operations LLC Defendants.	)	Civil Action No.: 5:17-01010-JMC SURVIVAL AND WRONGFUL DEATH ACTION JURY TRIAL DEMANDED

COMPLAINT FOR DAMAGES

NOW COMES PLAINTIFF, by and through her undersigned Counsel of Record, and, pursuant to the Federal Rules of Civil Procedure, files this Complaint for Damages against the Defendants named above, showing the Court as follows:

NATURE OF THE ACTION

1. At approximately 12:15 pm on December 6, 2016, a preventable tragedy at a Calhoun County industrial facility resulted in Alton Ray Zeigler, a husband, father, and grandfather, dying from asphyxiation as a result of the inhalation of foreign materials following an explosion which propelled an industrial pump, which weighs approximately 300 pounds, almost nine feet across a workspace before coming to rest as it put a hole in a cement block wall. This tragedy, which also involved two of Mr. Zeigler's co-workers suffering catastrophic, life-threatening burns, forms the basis of survival and wrongful death causes of action. Plaintiff seeks actual and consequential damages as well as punitive damages to halt and

deter such conduct from taking place in the future.

THE PARTIES, JURISDICTION, AND VENUE

2. Plaintiff, Mrs. Zeigler, is a citizen and resident of Richland County, South Carolina.

3. Plaintiff's decedent, Mr. Zeigler, was, at the time of his premature death, a citizen and resident of Richland County, South Carolina.

4. On January 5, 2017, Plaintiff was appointed Personal Representative of her late husband's estate by order of the Richland County Probate Court.

5. Defendant Eastman Chemical Company (hereinafter "Eastman") is a Delaware corporation with a principal place of business at 200 S. Wilcox Dr. Kingsport, Tennessee and whose registered agent for service of process in this State is Corporation Service Co., 1703 Laurel Street Columbia, South Carolina 29201. At all times relevant herein, Eastman conducted substantial business in South Carolina and this cause of action arises out of a tort committed in South Carolina and, therefore, personal jurisdiction is proper under South Carolina Code § 36-2-802 and South Carolina Code § 36-2-803.

6. Defendant Mundy Maintenance Service and Operations LLC (hereinafter "Mundy") is a business entity organized under the laws of the State of Texas with a principal place of business at 11150 South Wilcrest Drive, Suite 300 Houston, Texas 77099 and whose registered agent for service of process in this State is National Corporate Research, Ltd. 2 Office Park Court, Suite 103 Columbia, South Carolina 29223. Mundy is privately held and, upon information and belief, the members of Mundy Maintenance Service and Operations LLC are David Mundy and Shane Burden, both of whom are, upon information and belief, natural

persons who are citizens and residents of the State of Texas. At all times relevant herein, Mundy conducted substantial business in South Carolina and this cause of action arises out of a tort committed in South Carolina and, therefore, personal jurisdiction is proper under South Carolina Code § 36-2-802 and South Carolina Code § 36-2-803.

7. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship between Plaintiff and the Defendants, and the amount in controversy exceeds $75,000.00 exclusive of interest and costs.

8. Venue of this action properly lies in this judicial district pursuant to 28 U.S.C. § 1391(a) as it is the judicial district in which a substantial part of the events or omissions giving rise to the claims alleged herein occurred.

CONDITIONS PRECEDENT

9. All conditions precedent to the filing of this action and to the Plaintiff's right to the relief sought have occurred, have been performed, or have been excused.

FACTS COMMON TO ALL COUNTS

10. Plaintiff adopts and re-alleges each prior paragraph, where relevant, as if set forth fully herein.

11. Eastman is a global chemical company which manufactures and sells a broad portfolio of chemicals, plastics, and fibers.

12. Eastman began business in 1920 for the purpose of producing chemicals for Eastman Kodak Company's photographic business and became a public company, incorporated in Delaware, as of December 31, 1993.

13. In 1967, Eastman opened a facility, known as Carolina Eastman, on the banks of the Congaree River near Sandy Run a few miles northeast of Gaston in Calhoun County, South Carolina.

14. The Carolina Eastman facility subsequently began manufacturing polyethylene terephthalate which is also known as PET and commonly used in soda bottles.

15. On January 31, 2011, Eastman sold its PET business and related assets at Carolina Eastman to DAK Americas, LLC, a subsidiary of Alpek S.A.B. de C.V., a Mexican chemical manufacturing company.

16. Eastman retained a portion of the Carolina Eastman facility related to its Specialty Plastics segment subsequent to this sale, specifically retaining about 15 percent of the assets of the former Carolina Eastman facility.

17. As a result, beginning on February 1, 2011 and continuing as of December 6, 2016, Eastman owned property located at 500 K Avenue Gaston, South Carolina 29053.

18. However, beginning on February 1, 2011 and continuing as of December 6, 2016, Eastman employed less than five individuals at 500 K Avenue Gaston, South Carolina 29053.

19. In contrast, beginning on February 1, 2011 and continuing as of December 6, 2016, DAK Americas LLC owned property located at 570 K Avenue Gaston, South Carolina 29053 and employed more than 400 individuals.

20. Beginning on February 1, 2011 and continuing as of December 6, 2016, Eastman produced specialty plastics that are used in specialty films and packaging products sold into durables, packaging and other consumer products from the property it

retained at the former Carolinas Eastman facility.

21. Beginning on February 1, 2011 and continuing as of December 6, 2016, Eastman was not equipped to handle repairs to the property it retained at the former Carolinas Eastman facility with its own work force.

22. As a result, beginning on February 1, 2011 and continuing as of December 6, 2016, maintenance of the property Eastman retained at the former Carolinas Eastman facility was not a part or process of Eastman's business nor was it a core function of Eastman's actual business conducted at this location.

23. Moreover, beginning on February 1, 2011 and continuing as of December 6, 2016, maintenance of the property Eastman retained at the former Carolinas Eastman facility was not normally carried on by Eastman employees.

24. On December 6, 2016, Plaintiff's decedent, Alton Ray Zeigler, was a W2 employee of DAK Americas, LLC.

25. On December 6, 2016, Plaintiff's decedent, Alton Ray Zeigler, was not a W2 employee of Eastman or one of its subsidiaries.

26. On December 6, 2016, Eastman, including its subsidiaries, did not have the right to control the details of Mr. Zeigler's work.

27. By way of example, on December 6, 2016, Eastman, including its subsidiaries, did not exercise control over Mr. Zeigler's work.

28. By way of further example, on December 6, 2016, Eastman, including its subsidiaries, did not control the method of Mr. Zeigler's payment.

29. By way of further example, on December 6, 2016, Eastman, including its subsidiaries, did not furnish Mr. Zeigler equipment.

30. By way of further example, on December 6, 2016, Eastman, including its subsidiaries, did not have the right to fire Mr. Zeigler.

31. On December 6, 2016, Plaintiff's decedent Alton Ray Zeigler's work for Eastman was casual in nature, not regular in nature.

32. On December 6, 2016, Plaintiff's decedent Alton Ray Zeigler's work for Eastman was not an important part of the trade or business of Eastman as it did not involve the manufacturing of chemicals, plastics, and/or fibers.

33. On December 6, 2016, Plaintiff's decedent Alton Ray Zeigler's work for Eastman was not identical to work that Eastman's direct employees would regularly perform at 500 K Avenue Gaston, South Carolina 29053.

34. On December 6, 2016, Plaintiff's decedent Alton Ray Zeigler's work for Eastman was not identical to work that Eastman's direct employees had performed since February 1, 2011 on the pipeline(s) owned by Eastman.

35. Founded in 1955, Mundy is a privately owned business which provides various types of industrial maintenance and contracting services for customers in the Petrochemical, Chemical, Refining, Pharmaceutical and Biotech, Oil and Gas, Manufacturing and Film and Fiber industries.

36. During the several days immediately prior to December 6, 2016, Eastman arranged for Mundy to work on a pipeline owned by Eastman.

37. Specifically, Mundy was to clear a drain line in Eastman's pipeline.

38. Mundy's employees could not get the drain valve to open despite accumulating a significant amount of overtime.

39. After one of Mundy's employees abandoned this job because of the lack of

progress, another Mundy employee began heating the exterior of the crystalline structure pipe for an extended period of time.

40. As a direct and proximate result of this extended heating process, a fire occurred which caused damage to the pipe itself, insulation, and other nearby equipment.

41. Upon information and belief, this fire was extinguished by one or more fire extinguisher(s).

42. As a direct and proximate result of this fire, the material inside the subject drain pipe, a monomer product, decomposed, was altered, and/or converted some liquid into gas.

43. The degradation of the monomer increased the pressure inside the pipeline and turned the conditions soon to be experienced by the DAK crew, whose job was to remove a pump, into a bomb waiting to happen.

44. On December 6, 2016, DAK employees Jacob Jackson, Kevin Vann, and Plaintiff's decedent, Alton Zeigler, (hereinafter "the DAK crew") prepared to repair an approximately 300 pound pump owned by Eastman which had been leaking and was in the same pipeline as the drain line worked on in the preceding days by the Mundy employees.

45. The DAK crew was issued an Unusual Job Permit ("UJP") to perform the repairs on the pump by Eastman's Douglas Steve Rister.

46. Mr. Rister did not, however, provide the DAK crew with any written information about this job other than the UJP.

47. Mr. Rister told the DAK crew to anticipate that a small amount of monomer product would be released when the pump was removed.

48. Prior to removing the pump, all valves were shut off and "locked out" in accordance with all applicable rules, regulations, and/or protocols.

49. Specifically, Mr. Rister placed a lock on each valve.

50. At no point in time, however, did Eastman, by and through its officers, directors, employees, and/or agents, warn the DAK crew of all of the dangers and risks associated with removing the pump which were known by Eastman, through its officers, directors, employees, and/or agents.

51. Specifically, the DAK crew was unaware that the material inside the subject drain pipe, a monomer product, had decomposed, was altered, and/or converted some liquid into gas as a result of the recent fire event.

52. In addition, Eastman, by and through its officers, directors, employees, and/or agents, had vastly superior knowledge of the material in its pipeline, including its chemical properties, than the DAK crew.

53. The pipeline is heated by a Dowtherm line which maintains the material at 300 degrees Celsius.

54. The DAK crew loosened bolts on three flanges on the Dowtherm lines using pneumatic tools.

55. The DAK crew then loosened the pump bolts, breaching the pipeline.

56. As the DAK crew began preparations to remove the pump, a small amount of monomer product exited the pipeline through the pump.

57. Once the small amount of monomer product exited the pipeline through the pump, the DAK crew believed that the only danger warned of by Eastman's Douglas Steve Rister had passed.

58. Shortly thereafter, an explosion occurred, the force of which projected the pump, which weighs approximately 300 pounds, almost nine feet across the workspace before coming to rest as it put a hole in a cement block wall.

59. The blast also covered the workspace with as much as 500 gallons of the heated monomer product causing serious injuries to the three members of the DAK crew in the immediate vicinity.

60. Plaintiff's decedent, Alton Ray Zeigler, experienced conscious pain and suffering as a result of his injuries and subsequently died as a result of this tragic incident.

FIRST CAUSE OF ACTION
Negligence/ Survival Action: S.C. Code Ann. § 15-5-90
(Eastman)

61. Plaintiff adopts and re-alleges each prior paragraph, where relevant, as if set forth fully herein.

62. By virtue of Eastman's ownership of this property in Calhoun County, South Carolina, Eastman owed a duty to Plaintiff's decedent under South Carolina law.

63. Defendant Eastman owed Plaintiff's decedent, Alton Ray Zeigler, a duty of reasonable care and was negligent, grossly negligent, willful, wanton, reckless and careless and breached its duty of care by:

(i) Failing to adopt and implement adequate safety procedures and policies and communicate those policies and procedures to the DAK crew;

(ii) Failing to use reasonable care and precautions to ensure the safe replacement of a pump which was a part of the pipeline owned by Eastman;

(iii) Failing to exercise reasonable care in the design of the pipeline owned by

Eastman;

(iv) Failing to include a pressure relief valve on the pipeline owned by Eastman;

(v) Failing to exercise reasonable maintenance of the pipeline owned by Eastman;

(vi) Failing to ensure that prior work by Mundy on the pipeline owned by Eastman was conducted in a safe, workman-like manner;

(vii) Failing to exercise reasonable care in the inspection and testing of the pipeline owned by Eastman prior to the DAK crew commencing its work;

(viii) Failing to warn the DAK crew that the material inside the pipeline, a monomer product, had decomposed, was altered, and/or converted some liquid into gas as a result of the prior fire event;

(ix) Failing to warn the DAK crew of all of the dangers and risks associated with removing the pump which were known by Eastman, through its officers, directors, employees, and/or agents; and

(x) On such other and further particulars as the evidence may show.

64. As a direct and proximate result of the negligent, grossly negligent, willful, wanton and careless acts and/or omissions of Defendant Eastman, as set forth above, Plaintiff's decedent, Alton Ray Zeigler, suffered injuries, including excruciating pain and suffering, mental anguish, terror, knowledge of bodily injury and impending death, loss of income, funeral expenses, and such other damages as the Court or jury deems just and proper.

65. Plaintiff's decedent, Alton Ray Zeigler, has lost his life as set forth herein, and

Plaintiff is informed and believes she is entitled to a judgment against Defendant Eastman for actual and punitive damages in an amount to be determined by the trier of fact.

66. WHEREFORE Plaintiff demands judgment against Defendant Eastman for all actual and compensatory damages together with interest, if applicable, and all costs of this action and for such other and further relief as this Honorable Court and/or jury may deem just and proper.

SECOND CAUSE OF ACTION
Wrongful Death: S.C. Code Ann. § 15-51-10
(Eastman)

67. Plaintiff adopts and re-alleges each prior paragraph, where relevant, as if set forth fully herein.

68. By virtue of Eastman's ownership of this property in Calhoun County, South Carolina, Eastman owed a duty to Plaintiff's decedent under South Carolina law.

69. Defendant Eastman owed Plaintiff's decedent, Alton Ray Zeigler, a duty of reasonable care and was negligent, grossly negligent, willful, wanton, reckless and careless and breached its duty of care by:

(i) Failing to adopt and implement adequate safety procedures and policies and communicate those policies and procedures to the DAK crew;

(ii) Failing to use reasonable care and precautions to ensure the safe replacement of a pump which was a part of the pipeline owned by Eastman;

(iii) Failing to exercise reasonable care in the design of the pipeline owned by Eastman;

(iv) Failing to include a pressure relief valve on the pipeline owned by Eastman;

(v) Failing to exercise reasonable maintenance of the pipeline owned by Eastman;

(vi) Failing to ensure that prior work by Mundy on the pipeline owned by Eastman was conducted in a safe, workman-like manner;

(vii) Failing to exercise reasonable care in the inspection and testing of the pipeline owned by Eastman prior to the DAK crew commencing its work;

(viii) Failing to warn the DAK crew that the material inside the pipeline, a monomer product, had decomposed, was altered, and/or converted some liquid into gas as a result of the prior fire event;

(ix) Failing to warn the DAK crew of all of the dangers and risks associated with removing the pump which were known by Eastman, through its officers, directors, employees, and/or agents; and

(x) On such other and further particulars as the evidence may show.

70. As a direct and proximate result of the negligent, grossly negligent, willful, wanton and careless acts and/or omissions of Defendant Eastman, as set forth above, Plaintiff and Plaintiff's decedent's beneficiaries have suffered damages, present and prospective, which are naturally the proximate consequence of the Defendant's wrongful acts, including pecuniary loss, mental shock and suffering, wounded feelings, grief and sorrow, loss of companionship, funeral expenses, and such other damages as the Court or jury deems just and proper.

71. Plaintiff's decedent, Alton Ray Zeigler, has lost his life as set forth herein, and

Plaintiff is informed and believes she is entitled to a judgment against Defendant Eastman for actual and punitive damages in an amount to be determined by the Trier of fact.

72. WHEREFORE Plaintiff demands judgment against Defendant for all actual and compensatory damages together with interest, if applicable, and all costs of this action and for such other and further relief as this Honorable Court and/or jury may deem just and proper.

THIRD CAUSE OF ACTION
Negligence/ Survival Action: S.C. Code Ann. § 15-5-90
(Mundy)

73. Plaintiff adopts and re-alleges each prior paragraph, where relevant, as if set forth fully herein.

74. By undertaking the work of draining the drain valve on the Eastman pipeline, Mundy undertook a duty to exercise reasonable care in this work and thus owed a duty to Plaintiff's decedent under South Carolina law.

75. Defendant Mundy owed Plaintiff's decedent, Alton Ray Zeigler, a duty of reasonable care and were negligent, grossly negligent, willful, wanton, reckless and careless and breached its duty of care by:

(i) Failing to adopt and implement adequate safety procedures and policies and communicate those policies and procedures to its employees working on the Eastman pipeline;

(ii) Failing to use reasonable care and precautions to drain the drain valve;

(iii) Negligently starting a fire that caused the material inside the pipeline, a monomer product, to decompose, become altered, and/or convert some liquid into gas as a result of the prior fire event; and

(iv) On such other and further particulars as the evidence may show.

76. As a direct and proximate result of the negligent, grossly negligent, willful, wanton and careless acts and/or omissions of Defendant Mundy, as set forth above, Plaintiff's decedent, Alton Ray Zeigler, suffered injuries, including excruciating pain and suffering, mental anguish, terror, knowledge of bodily injury and impending death, loss of income, funeral expenses, and such other damages as the Court or jury deems just and proper.

77. Plaintiff's decedent, Alton Ray Zeigler, has lost his life as set forth herein, and Plaintiff is informed and believes she is entitled to a judgment against Defendant Mundy for actual and punitive damages in an amount to be determined by the trier of fact.

78. WHEREFORE Plaintiff demands judgment against Defendant Mundy for all actual and compensatory damages together with interest, if applicable, and all costs of this action and for such other and further relief as this Honorable Court and/or jury may deem just and proper.

FOURTH CAUSE OF ACTION
Wrongful Death: S.C. Code Ann. § 15-51-10
(Mundy)

79. Plaintiff adopts and re-alleges each prior paragraph, where relevant, as if set forth fully herein.

80. By undertaking the work of draining the Eastman pipeline, Mundy undertook a

duty to exercise reasonable care in this work and thus owed a duty to Plaintiff's decedent under South Carolina law.

81. Defendant Mundy owed Plaintiff's decedent, Alton Ray Zeigler, a duty of reasonable care and were negligent, grossly negligent, willful, wanton, reckless and careless and breached its duty of care by:

(i) Failing to adopt and implement adequate safety procedures and policies and communicate those policies and procedures to its employees working on the Eastman pipeline;

(ii) Failing to use reasonable care and precautions to drain the drain valve;

(iii) Negligently starting a fire that caused the material inside the pipeline, a monomer product, to decompose, become altered, and/or convert some liquid into gas as a result of the prior fire event; and

(iv) On such other and further particulars as the evidence may show.

82. As a direct and proximate result of the negligent, grossly negligent, willful, wanton and careless acts and/or omissions of Defendant Mundy, as set forth above, Plaintiff and Plaintiff's decedent's beneficiaries have suffered damages, present and prospective, which are naturally the proximate consequence of the Defendant Mundy's wrongful acts, including pecuniary loss, mental shock and suffering, wounded feelings, grief and sorrow, loss of companionship, funeral expenses, and such other damages as the Court or jury deems just and proper.

83. Plaintiff's decedent, Alton Ray Zeigler, has lost his life as set forth herein, and Plaintiff is informed and believes she is entitled to a judgment against Defendant Mundy for actual and punitive damages in an amount to be determined by the

Trier of fact.

84. WHEREFORE Plaintiff demands judgment against Defendant Mundy for all actual and compensatory damages together with interest, if applicable, and all costs of this action and for such other and further relief as this Honorable Court and/or jury may deem just and proper.

FIFTH CAUSE OF ACTION
Negligent Failure to Warn
(Eastman)

85. Plaintiff incorporates by reference all allegations contained in the Paragraphs above, as if set forth verbatim herein.

86. By virtue of Eastman's ownership of this property in Calhoun County, South Carolina, Eastman owed a duty to Plaintiff's decedent under South Carolina law.

87. Defendant Eastman owed duties to warn of foreseeable dangerous conditions in its pipeline which would impair the safety of non-employees performing maintenance and repair work on its pipeline.

88. Defendant Eastman knew or should have known that as a direct and proximate result of the fire days earlier, the material inside the subject drain pipe, a monomer product, decomposed, was altered, and/or converted some liquid into gas.

89. As a result, it was foreseeable to Defendant Eastman that an explosion could occur when the pipeline was breached.

90. Defendant Eastman would have no reason to believe that Plaintiff's decedent would realize this potential danger.

91. Defendant Eastman, through its officers, directors, and employees, including but not limited to Douglas Steve Rister, failed to exercise reasonable care to inform

Plaintiff's decedent of the dangerous condition of the drain pipe and the corresponding risk for an explosion.

92. As a direct and proximate result of Defendant Eastman's negligent failure to warn, Plaintiff's decedent suffered injuries, including excruciating pain and suffering, mental anguish, terror, knowledge of bodily injury and impending death, before ultimately succumbing to his injuries and dying.

93. Plaintiff is informed and believes she is entitled to a judgment against Defendant Eastman for actual and punitive damages in an amount to be determined by the Trier of fact for their negligent failure to warn.

94. WHEREFORE Plaintiff demands judgment against Defendant Eastman for all actual and compensatory damages together with interest, if applicable, and all costs of this action and for such other and further relief as this Honorable Court and/or jury may deem just and proper.

SIXTH CAUSE OF ACTION
Loss of Consortium
(All Defendants)

95. Plaintiff adopts and re-alleges each prior paragraph, where relevant, as if set forth fully herein.

96. The Defendants' actions and inactions were each a direct and proximate cause of Alton Ray Zeigler's death and a tortious violation of Plaintiff's right to the companionship, aid, society and services of Alton Ray Zeigler.

97. As a direct and proximate result of the conduct and misconduct of the Defendants Eastman and Mundy, Plaintiff has suffered and continues to suffer the loss of consortium, household services, aid, society, support, and companionship of Alton

Ray Zeigler.

98. WHEREFORE Plaintiff demands judgment against Defendants Eastman and Mundy for the loss of consortium, household services, aid, society, support, and companionship to which she is entitled with her spouse.

SEVENTH CAUSE OF ACTION
Punitive and Exemplary Damages
(All Defendants)

99. Plaintiff incorporates by reference all allegations contained in the Paragraphs above, as if set forth verbatim herein.

100. The actions and inactions of Defendants Eastman and Mundy were of such a character as to constitute a pattern or practice of willful, wanton and reckless misconduct causing substantial harm and resulting in damages to the Plaintiff and injuries and death to the Plaintiff's decedent.

101. More specifically, Defendants acted with a conscious and flagrant disregard for the rights and safety of Plaintiff's decedent and/or deliberately engaged in willful, wanton and reckless disregard for the life and safety of Alton Ray Zeigler and others similarly situated.

102. Accordingly, Defendants are liable for punitive and exemplary damages awardable to Plaintiff.

103. WHEREFORE Plaintiff demands judgment against Defendants for punitive and exemplary damages, plus interest, costs, and such other and further relief as the Court or jury may deem just and proper.

PRAYER FOR RELIEF

WHEREFORE the Plaintiff prays as follows:

1. For a trial by jury – which is hereby demanded pursuant to Fed. R. Civ. P. 38(b).

2. For judgment against Defendants Eastman Chemical Company and Mundy Maintenance Service and Operations LLC for such sums as actual and other compensatory damages in an amount as a jury may determine and in excess of the minimum jurisdictional limit of this Honorable Court.

3. For exemplary and punitive damages against Defendants Eastman Chemical and Mundy Maintenance Service and Operations LLC as a jury may determine to halt such conduct.

4. For the costs of this suit pursuant to Fed. R. Civ. P. 54(d).

5. For such other and further relief to which she may be entitled and as this Honorable Court may deem just and proper.

[*Signature page follows*]

Respectfully submitted this 19th day of April, 2017.

MOTLEY RICE LLC

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